

EXHIBIT D

*** HIGHLY CONFIDENTIAL ***

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Case No. 3:07-cv-05944 SC

MDL No. 1917

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IN RE: CATHODE RAY TUBE (CRT)

ANTITRUST LITIGATION

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This Document Relates to:

ALL ACTIONS

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Taipei 101 Tower
Xinyi Road
Taipei City, 11049
Taiwan

February 21, 2013

9:41 a.m.

Volume III of III

CONTINUED DEPOSITION of CHIH CHUN-LIU, held at the
aforementioned time and place, before Audrey
Shirley, Qualified Realtime Reporter, MBIVR

1	Trade Agreement?	10:27:31
2	A. Within the area there are trade	10:27:31
3	preferential treatments.	10:27:35
4	Q. For which countries?	10:27:37
5	A. I believe Canada, United States and	10:27:42
6	Mexico.	10:27:46
7	Q. So what does this paragraph say	10:27:49
8	concerning Philips Brazil and the North American	10:27:51
9	Free Trade Agreement?	10:27:56
10	MR. LAU: Objection; best evidence rule.	10:27:59
11	THE WITNESS: It says Philips Brazil	10:28:34
12	produces tubes for sales in that country in NAFTA	10:28:36
13	and in Argentina. Its products would not be sold	10:28:47
14	to places that we normally sell to to mess up the	10:28:59
15	market.	10:29:07
16	BY MR. VARANINI:	10:29:13
17	Q. Mr. Liu, can you please turn to point	10:29:14
18	number 6 of the report, concerning BMCC, which	10:29:17
19	would be Bates number CHU00029176. Could you	10:29:23
20	please review that paragraph?	10:29:35
21	A. I'm done.	10:29:38
22	Q. What does that paragraph say concerning	10:29:51
23	BMCC's exports of 14-inch color picture tube?	10:29:55
24	MR. LAU: Objection; best evidence rule.	10:30:01
25	THE WITNESS: It says that it sells to	10:30:30

1 Samsung, AKEI and Matsushita. It will not 10:30:43
2 increase production or create troubles. 10:30:49
3 BY MR. VARANINI: 10:30:58
4 Q. And based on your background and 10:30:58
5 experience, Mr. Liu, what does the term AKEI 10:31:02
6 stand for? 10:31:06
7 A. Oh, if I remember correct it's 10:31:06
8 Matsushita in U.S., New Jersey. 10:31:12
9 Q. So, does AKEI sell televisions in the 10:31:18
10 U.S. market? 10:31:22
11 A. Yes. 10:31:22
12 MR. VARANINI: Madam reporter, can you 10:31:39
13 please show Mr. Liu the document that's been 10:31:41
14 previously marked for identification as Exhibit 10:31:43
15 Number 1157. 10:31:47
16 BY MR. VARANINI: 10:31:47
17 Q. Mr. Liu, can you take a moment to look 10:32:15
18 over the document that's been marked as 10:32:17
19 Exhibit 1157, that begins with Bates number 10:32:19
20 CHU00029163? 10:32:24
21 A. Yes. 10:32:44
22 Q. What is this document? 10:32:45
23 A. This is CPT group meeting minutes. 10:32:46
24 Q. And who for Chunghwa attended this 10:32:51
25 meeting? 10:32:53

1 CERTIFICATE OF COURT REPORTER

2
3 I, Audrey Shirley, Member of the British
4 Institute of Verbatim Reporters, Qualified
5 Realtime Reporter, hereby certify that the
6 foregoing testimony was recorded by me
7 stenographically and thereafter transcribed by
8 me, and that the foregoing transcript is a true
9 and accurate verbatim record of the said
10 testimony, to the best of my skill and ability.

11 I further certify that I am not
12 a relative, employee or counsel of any of the
13 parties of the within cause, nor am I an employee
14 or relative of any counsel for the parties, nor
15 am I in any way interested in the outcome of the
16 within cause.

17
18
19
20 Signed

Audrey Shirley

21 Audrey Shirley, MBIVR, QRR

22
23 Date: February 26, 2013.
24
25